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PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Western DIVISION

Dr. Charay Sharonda Dupree Smith,

(Enter above the full name  
of the Plaintiff[s] in this  
action).

Case No. 5:22-CV-00354-D

(To be assigned  
by the Clerk of  
District Court)

vs.

Ancora Education (Traci Hughes)  
Andrea Snow, Esquire  
Yinet Vento

(Enter above the full name of  
ALL Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of all the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

COMPLAINT

1. Plaintiff resides at 1537 Stackhouse Drive  
Fayetteville, NC 28314

2. Defendant(s) name(s): Ancora Education (Traci Hughes)  
Andrea Snow, Yinet Vento

Location of principal office(s) of the named defendant(s):

2241 S. Watson Rd. Arlington, TX 76010

Nature of defendant(s) business:

Proprietary Education

Approximate number of individuals employed by defendant:

1001-5000

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) ☐ Failure to employ me.
- (B) ☒ Termination of my employment.
- (C) ☐ Failure to promote me.
- (D) ☒ Other acts as specified below:

Left me out of essential conversations, necessary to do my job, not allowing me to supervise staff. Limiting access. Belittling + harassing me due to my acceptance at a major, majority white conference, where defendants, believed "I did not belong". Failure to Pay 10 PTO days, breach in contract, disability exclusion. Retaliation.

5. Plaintiff is:

(A) ☒ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were April 26, 2021 - August 20, 2021

Employment was terminated because:

(1) ☒ plaintiff was discharged.

(2) ☐ plaintiff was laid off.

(3) ☐ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) ☒ my race.

(B) ☐ my religion.

(C) ☐ my sex.

(D) ☐ my national origin.

(E) ☒ other as specified below:

disability

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Yinet Vento, Executive Director Miller Motte Raleigh  
Andrea Snow, Vice President, Ancora Operations

8. The alleged discrimination occurred on or about

July 2021

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

- Limited access to information needed to supervise staff
- Prevented me from attending "Majority White" conference
- Failed to provide reasonable accommodations related to disability.

10. The alleged illegal activity took place at:

Miller Motte - College, Raleigh

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct

on or about August 20, 2021. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on June

20, 2022

12. I seek the following relief:

- (A) ☒ recovery of back pay;
- (B) ☐ reinstatement to my former job;
- (C) ☒ trial by jury on all issues so triable;

and any other relief as may be appropriate, including  
injunctive orders, damages, costs and attorney's fees.

09/06/2022  
Date

Charay S. Smith  
Signature of Plaintiff

1537 Stackhouse Dr.  
Fayetteville, NC 28314  
9108857006  
Address and Phone Number of Plaintiff